

River Protection Project
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CCN: 013062

MAY 31 2000

Dear Dr. Gibbs:

**CONTRACT NO. DE-AC27-96RL13308 -- W375 -- RESPONSE TO PERSONNEL
TRAINING AND QUALIFICATION INSPECTION REPORT, IR-00-003**

Reference: CCN 012750, Letter, D. C. Gibbs, DOE/RL, to M. J. Bullock, BNFL Inc.,
"Personnel Training and Qualification Inspection Report, IR-00-003," 00-RU-0310,
dated April 5, 2000.

During the period of March 6-10, 2000, the Regulatory Unit (RU) conducted an inspection of the River Protection Project-Waste Treatment Plant's personnel training and qualification programs. As a result of the inspection, the RU identified one finding; this finding is summarized below.

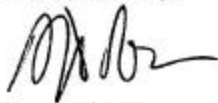
Early identification of potential problems through structured surveillance and audits is a required action cited in the Project Quality Assurance Program and Implementation Plan. A Quality Assurance surveillance performed in October 1999 and its associated Deficiency Report (DR) were not issued until February 2000; the Corrective Action Report to address the DR was issued in March 2000. Therefore, the potential problems from the surveillance were not provided in a timely fashion to the personnel responsible for identification, approval and implementation of corrective actions.

This correspondence provides our response to the finding as requested in the referenced letter (Attachment 1). In addition to the specific remedial and corrective actions identified in that response, a summary of a major Project initiative is also included. The initiative, documented as a Project Quality Improvement Action Plan, dated March 29, 2000, addresses broad Project actions that are relevant to the finding in the subject Inspection. Project activities being identified and performed as a result of this initiative are dynamic; therefore, the Plan is being developed as a "living action plan" addressing an ongoing evaluation of project-wide work management processes. This effort is managed by a steering committee and the actions being taken under this plan are regularly discussed with RU personnel.

It is also noted that the subject Inspection Report made a number of observations pertinent to personnel selection and qualification processes, and the focus of the training program. These observations will be fully considered in the revision and/or development of personnel selection, qualification and training processes and programs to meet the demands of the detailed design, construction, and operations phases of the Project.

Attached for your use, is a disk in Microsoft Word format containing this letter and the response to the Finding (Attachment 2). If you have any questions or if we can be of further assistance, please call Dennis Klein at (509) 371-4867 or Carole Younger at (509) 371-4857.

Yours sincerely,



A. J. Dobson
Manager, Operations and Safety

DMS/jca

- Attachments: 1. Response to Finding IR-00-003-01-FIN
2. Disk with Letter CCN 013062 and Attachment

cc:

Barr, R. w/a	DOE/RL	A4-70
Barrett, M.K. w/o	DOE/ORP	H6-60
Brown, N. w/a	DOE/ORP	H6-60
Bullock, M.J. w/a	BNFL Inc.	A114
Dobson, A.J. w/a	BNFL Inc.	A117
Klein, D.A. w/a	BNFL Inc.	P129
Landry, W. w/o	BNFL Inc.	Fairfax
Lehman, K.D. w/a	BNFL Inc.	R113
Molnar, E. w/o	BNI	A216
Morgan, S.R. w/o	BNFL Inc.	A116
PDC w/a	BNFL Inc.	K110
Smith, D.M. w/a	BNFL Inc.	R115
Smyser, L. w/a	PNNL	H6-61
Tooze, R. w/o	BNFL Inc.	Fairfax
Voyles, G. w/a	BNFL Inc.	B105
Williams, N. w/a	BNI	A215
Witherspoon, M., w/a	BNFL Inc.	A104

**RESPONSE TO FINDING
IR-00-03-01-FIN**

Summary of Finding

During performance of an inspection of the Personnel Training and Qualification program conducted March 6-10, 2000 at the Contractor's offices, the Regulatory Unit (RU) identified the following:

Section 3.2 of the Contractor's Quality Assurance Program and Implementation Plan (QAPIP), Revision 4, dated May 1998, required "Early identification of potential problems through structured surveillance and audits."

Contrary to the above, during the week of March 6-10, 2000, the inspectors found that a quality assurance surveillance (SV-W375-00-QA00003) was performed in October 1999; however, the report and an associated deficiency report (DR-W375-99-QA00115) were not issued until February 18, 2000. Furthermore, the required Corrective Action Report (CAR-W375-00-QA00002) was not issued until March 8, 2000. Therefore, the potential problems from the surveillance were not identified to promote improvement to those responsible for potential corrective actions for several months.

This is considered an inspection Finding.

BNFL Inc. response:

1. Agreement or disagreement with the Finding

BNFL Inc. agrees with the Finding.

2. Reason for the Finding

The primary reason for the Finding is improper resource allocation to the Project Quality Assurance (QA) audit and surveillance activities. Numerous priority tasks required the attention of QA assessment personnel during November and December 1999, and January 2000. The highest priority was providing support to an activity that had the potential for Project wide impact. The QA audit personnel were part of the QA resource that provided priority attention to this activity. Consequently, completion of the formal documentation of the October 1999 surveillance of personnel selection records was postponed.

A secondary reason for the Finding is the lack of specific requirements in the procedure for performing QA surveillance activities. The procedure provides direction on how to plan and conduct a surveillance but lacks specific direction on expected timeframes for completing this work. This allowed a lowering of the priority for completing the surveillance.

3. Corrective steps that have been taken and the results achieved

The following remedial actions have been taken or will be taken:

- Additional personnel resources were assigned to the QA organization to address current QA work. Since January 1, 2000, 8 additional experienced quality assurance staff have been added to the QA organization; 2 were added to the audits and assessments function.
- Revised QA organization staffing levels were approved on March 8, 2000; staffing at this level (an increase of 8 positions) was achieved on March 20, 2000. Performance of the QA organization at this higher level of personnel staffing is expected to effectively support the design phase of the Project.
- A Deficiency Report (DR-W375-00-QA00017_0) was initiated by Quality Assurance on March 9, 2000, addressing a concern raised by the RU during the ongoing inspection that delays in completion of formal surveillance activities were causing the Project to not meet the QAPIP requirement regarding "early notification of potential problems". The deficiency report recommended:
 - Review and document cause and extent of conditions noted
 - Initiate appropriate corrective and preventive measures based on review
 - Determine process improvements including but not limited to timeliness of reporting
- An initial review of the extent of lack of timeliness was conducted in March 2000; this review, documented as a self-assessment (SA-W375-00-00023, dated March 14, 2000), identified numerous assessment activity documents that had been completed but not formally issued. Evaluation of the significance of these items and identification of appropriate corrective action (which may be related to timeliness of reporting and managing potential problems) has been incorporated into a Project Quality Improvement Action Plan (PL-W375-MG00005, Rev.0), dated March 29, 2000. This Plan was developed following a comprehensive review of Project-wide work performance and assessment processes.

4. The corrective steps that will be taken to avoid further Findings

- As part of the QA organization effort to strengthen its assessment program, procedure K13P053, Quality Assurance Surveillance, is being revised to clarify the requirements for completion of assessment activities.
- As a related effort, the Project Quality Implementation Action Plan (PQIAP) has identified and is addressing a Project-wide weakness in internal assessments and corrective action management. Specific elements of the action plans in the PQIAP that will complement Project actions to strengthen QA assessments are: (1) AP-2, Corrective Action Management System (CAMS), and (2) AP-3, Internal Assessment Program. Actions under AP-2 to strengthen CAMS (e.g., complete program and procedure modifications, standardize the format and use of the database, and train affected

personnel) are to be completed by June 30, 2000. Actions under AP-3 to strengthen the internal assessment program (e.g., review contract and regulatory requirements, evaluate management assessment results, develop and use annual assessment plans and schedules, and revise and train on procedures) are to be completed by July 28, 2000.

- 5. The date when full compliance with the applicable commitments in the Authorization Basis as it applies to the Finding, i.e., Quality Assurance Program and Implementation Plan, will be achieved.**

Procedure K13P053 will be revised to incorporate updated management direction on performance and completion of these assessments, including training of QA personnel conducting surveillance activities, by July 28, 2000.

PQIAP Action Plans 2 and 3 will be completed by June 30 and July 28, 2000, respectively.